

June 24, 1988

BY HAND

Barbara Newman, Project Manager
Massachusetts Superfund Section
Waste Management Division
J.F.K. Federal Building, HRS-CAN2
Boston, MA 02203.

Re: Woburn Wells G & H Pilot Test

Dear Barbara:

We are writing to urge EPA to authorize us to commence the source removal pilot test we have proposed for W.R. Grace and UniFirst as soon as possible. For the reasons we have previously discussed with Gretchen Muench, David Lang and you, it is our strong professional opinion that this test should be conducted before EPA finalizes its Record of Decision in September.

As we think we all agree, the most effective way to remove contamination from the groundwater system is to pump close to the sources. We have good reason to believe that we can remove contamination over a relatively short period of time by pumping and treating groundwater from the bedrock at UniFirst and from the overburden and shallow bedrock at W.R. Grace. In addition, we think this combined system could hydraulically isolate the northeast quadrant of the site.

As you know, our clients have authorized us to proceed immediately to perform a thirty-day pilot test, but we need authorization from EPA before we can begin the test. We are very concerned that EPA not miss the opportunity to perform the test this summer. Performing the test this summer will enable EPA to produce a much better quality ROD, with a higher level of remedy definition and confidence.

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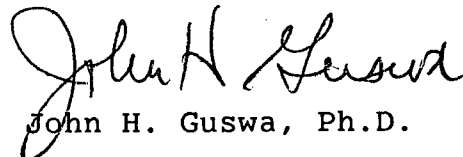
More importantly, performing the pilot test now would permit much earlier implementation of a remedy. Postponing the test until the "design phase" following the ROD almost certainly will delay the test and implementation of the remedy for at least a year, and perhaps longer, due to practical considerations. These include the undesirability of trying to operate sensitive monitoring well sampling devices and pilot treatment systems during the winter months; the problems that snow cover and snow removal activities present for access to monitoring wells; the desirability of having long days for taking synoptic water levels from numerous, dispersed sampling points; and the fact that the optimum time for conducting a pilot test is during low flow conditions, which, if they exist at the site, will be encountered during the summer months (low flow conditions provide a "worst case" for evaluating sustainable pumping rates). Furthermore, the sooner the pilot test is conducted and the remedy can begin, the sooner and more completely the system can be cleaned up.

The personnel and work required for the test have been scheduled and are ready to go now. Please be assured that we and our clients stand ready to do everything in our power to work with you to seize this opportunity to acquire meaningful data in a timely fashion, so as to speed and improve the ultimate remedy.

Sincerely,



John A. Cherry, Ph.D.



John H. Guswa, Ph.D.

cc: David Lang
M. Gretchen Muench

XP-0411/u